1	DANIEL G. BOGDEN		
2	United States Attorney AMBER M. CRAIG Assistant United States Attorney 333 Las Vegas Blvd. South, Suite 5000		
3			
4	Las Vegas, Nevada 89101 PHONE: (702) 388-6336		
5	FAX: (702) 388-6698		
6	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
7	-oOo-		
8	UNITED STATES OF AMERICA,	2:14-cr-103-GMN-VCF	
9	Plaintiff,	STIPULATION TO CONTINUE	
10	vs.	GOVERNMENT'S DEADLINE TO RESPOND TO MOTION FOR RELIEF	
11	HECTOR FERNANDO ZAMBRANO- REYES,	FROM PREJUDICIAL JOINDER (Seventh Request)	
12	Defendant.		
13	IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United		
14	States Attorney, and Amber M. Craig, Assistant United States Attorney, counsel for the United		
15	States of America, and Osvaldo Fumo, Esq., counsel for Defendant Hector Zambrano-Reyes, that		
16	the Government's deadline to respond to the Defe	endant's Motion for Relief from Prejudicial Joinder	
17	currently set for July 22, 2015, be vacated and continued for thirty days, or to a date to be set at the		
18	Court's convenience.		
19	This stipulation is entered into for the following reasons:		
20	The parties are engaged in plea negoti	ations which may resolve the case without the need	
21	to litigate the motion, and additional time is needed for the negotiations.		
22	2. Defendant is in custody and does not object to the continuance.		
23	3. For the reasons stated above, the ends of justice would best be served by a continuance of		
24	the response deadline.		

1	4. Additionally, denial of this request for continuance could result in a miscarriage of	
2	justice.	
3	5. The additional time requested by this Stipulation is excludable in computing the time	
4	within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United	
5	States Code, Sections 3161(h)(3)(A) and (h)(7)(A), considering the factors under Title 18, United	
6	States Code, Sections 3161(h)(7)(B)(i) and (h)(7)(B)(iv).	
7	6. This is the seventh request for a continuance filed herein.	
8	DATED this 22 nd day of July, 2015.	
9	DANIEL G. BOGDEN	
10	United States Attorney	
11	/s/ Osvaldo Fumo /s/ Amber M. Craig OSVALDO FUMO, ESQ. AMBER M. CRAIG	
12	Counsel for Defendant Zambrano-Reyes Assistant United States Attorney	
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		

1 UNITED STATES DISTRICT COURT 2 DISTRICT OF NEVADA -oOo-3 UNITED STATES OF AMERICA, 4 Plaintiff, 2:14-cr-103-GMN-VCF 5 FINDINGS OF FACT, CONCLUSIONS VS. 6 OF LAW, AND ORDER HECTOR FERNANDO ZAMBRANO-7 REYES. 8 Defendant. FINDINGS OF FACT 9 Based upon the pending Stipulation of counsel, and good cause appearing therefore, the 10 Court finds that: 11 1. The parties are engaged in plea negotiations which may resolve the case without the need 12 to litigate the motion, and additional time is needed for the negotiations. 13 2. The Defendant is in custody and does not object to the continuance. 14 3. For the reasons stated above, the ends of justice would best be served by a continuance of 15 the response deadline. 16 4. Additionally, denial of this request for continuance could result in a miscarriage of 17 justice. 18 5. The additional time requested by this Stipulation is excludable in computing the time 19 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, 20 United States Code, Sections 3161(h)(3)(A) and (h)(7)(A), considering the factors under Title 18, 21 United States Code, Sections 3161(h)(7)(B)(i) and (h)(7)(B)(iv). 22 **CONCLUSIONS OF LAW** 23 The ends of justice served by granting said continuance outweigh the best interest of the 24

Case 2:14-cr-00103-GMN-VCF Document 228 Filed 07/22/15 Page 4 of 4

public and the Defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence. The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(1)(A), (h)(7)(A), (h)(7)(B)(i), and (h)(7)(B)(iv). **ORDER** IT IS THEREFORE ORDERED that the Government's deadline to file its response to Defendant's Motion for Relief from Prejudicial Joinder, currently scheduled for July 22, 2015, be vacated and continued to the 24th day of August, 2015. DATED this 22nd day of July, 2015. Can Facher HONORABLE CAM FERENBACH UNITED STATES MAGISTRATE JUDGE